

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	Criminal No. 23cr10207
	)	
v.	)	Violations:
	)	
(1) LEONARDO LARA,	)	<u>Count One:</u> Conspiracy to Distribute and to
(2) MERCED NAVARRO-MORFIN, and	)	Possess with Intent to Distribute Controlled
(3) LEANDRO MARTINEZ,	)	Substances
	)	(21 U.S.C. § 846)
Defendants	)	
	)	<u>Count Two:</u> Possession with Intent to
	)	Distribute Cocaine
	)	(21 U.S.C. § 841(a)(1))
	)	
	)	<u>Drug Forfeiture Allegation:</u>
	)	(21 U.S.C. § 853)

INDICTMENT

COUNT ONE

Conspiracy to Distribute and to Possess with Intent to Distribute  
Controlled Substances  
(21 U.S.C. § 846)

The Grand Jury charges:

From on or about April 5, 2022, through on or about April 20, 2022, in Methuen, Lawrence,  
and Sturbridge, and elsewhere in the District of Massachusetts, and elsewhere, the defendants,

(1) LEONARDO LARA,  
(2) MERCED NAVARRO-MORFIN, and  
(3) LEANDRO MARTINEZ,

conspired with each other and with other persons known and unknown to the Grand Jury, to  
knowingly and intentionally distribute and possess with intent to distribute controlled substances,  
in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the offense charged in Count One involved five kilograms or more

of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance. Accordingly, Title 21, United States Code, Section 841(b)(1)(A)(ii) is applicable to this Count.

It is further alleged that, with respect to Count One, five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, were reasonably foreseeable by, and are attributable to, (1) LEONARDO LARA and (2) MERCED NAVARRO-MORFIN. Accordingly, Title 21, United States Code, Section 841(b)(1)(A)(ii) is applicable to defendants (1) LEONARDO LARA and (2) MERCED NAVARRO-MORFIN.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

Possession with Intent to Distribute Cocaine  
(21 U.S.C. § 841(a)(1))

The Grand Jury further charges:

On or about April 20, 2022, in Methuen, in the District of Massachusetts, the defendants,

(2) MERCED NAVARRO-MORFIN and  
(3) LEANDRO MARTINEZ,

did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

DRUG FORFEITURE ALLEGATION  
(21 U.S.C. § 853)

The Grand Jury further finds:

1. Upon conviction of one or more of the offenses in violation of Title 21, United States Code, Sections 841 and 846, set forth in Counts One and Two, the defendants,

- (1) LEONARDO LARA,
- (2) MERCED NAVARRO-MORFIN, and
- (3) LEANDRO MARTINEZ,

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offenses; and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses. The property to be forfeited includes, but is not limited to, the following assets:

- a. \$40,020 seized from defendant (1) LEONARDO LARA on or about April 20, 2022, in Sturbridge, Massachusetts;
- b. \$195,845 seized from defendants (2) MERCED NAVARRO-MORFIN and (3) LEANDRO MARTINEZ, on or about April 20, 2022, in Methuen, Massachusetts;

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 21, United States Code, Section 853, as a result of any act or omission of the defendants --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or

- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property described in Paragraph 1 above.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL

  
FOREPERSON

  
SAMUEL R. FELDMAN  
ASSISTANT UNITED STATES ATTORNEY  
DISTRICT OF MASSACHUSETTS

District of Massachusetts: August 3, 2023  
Returned into the District Court by the Grand Jurors and filed.

/s/ Noreen A. Russo  
DEPUTY CLERK at 11:22 am

